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BETTINA THAKORE (4)

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE BARRY T. MOSKOWITZ)

UNITED STATES OF AMERICA, Plaintiff, v. PETER CARLO MERTENS, et al. Defendants.	Criminal Case No. 08CR0440-BTM NOTICE OF MOTION AND MOTION TO JOIN MOTIONS OF CO-DEFENDANT WILLIAM HAMMAN (1) TO COMPEL DISCOVERY AND (2) FOR LEAVE TO FILE FURTHER MOTIONS Date: March 28, 2008 Time: 1:30 p.m.

TO KAREN P. HEWITT, UNITED STATES ATTORNEY, AND SHERRI WALKER HOBSON, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on March 28, 2008, at 1:30 p.m., or as soon thereafter as counsel may be heard, Defendant BETTINA THAKORE (4), by and through her attorney of record, Lisa J. Damiani of the Damiani law Group APC, will move this court for an order joining Defendant WILLIAM HAMMAN's Motions to Compel Discovery and for Leave to File Further Motions, filed with this court on March 6, 2008. At that time, she will join in Mr. Hamman's request for an order compelling discovery and granting leave to file further pretrial motions.

Motion to Join

Defendant BETTINA THAKORE (4), by and through her attorney of record, Lisa J. Damiani of the Damiani Law Group APC, hereby moves this court for an order joining Defendant, WILLIAM HAMMAN's Motion to Compel Discovery and for Leave to File Further Motions, which were filed with this court on March 6, 2008. As of the filing of this motion, counsel for Ms. Thakore has not received any discovery in this matter. She has been informed that over 1700 pages of discovery are ready for pick up at the copy center. She is presently in the process of obtaining the discovery. However, Ms. Thakore will need additional time to review the discovery, research issues presented and prepare additional pretrial motions. As such, she respectfully joins in Mr., Hamman's motions.

Dated: March 11, 2008

Respectfully Submitted,

DAMIANI LAW GROUP APC

By S/Lisa J. Damiani

Lisa J. Damiani, Esq.
Attorney for Defendant,
BETTINA THAKORE (4)